



May 6, 2011

John Gerritsma
Field Manager
Ashland Resource Area
Bureau of Land Management
3040 Biddle Road
Medford, Oregon 97504

In Reply To: Pilot Joe Timber Sale Scoping

Dear Mr. Gerritsma:

The American Forest Resource Council (AFRC) is pleased to provide this information to be included in your planning of the proposed Pilot Joe Timber Sale. AFRC represents 80 forest product businesses and forest landowners in the west. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities adjacent to the Medford Bureau of Land Management, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities.

The April 8, 2011 Scoping Notice for the Pilot Joe Timber Sale requests input on “potential alternatives to our proposed action that could meet the objectives described” or “provide information on potential issues and concerns that the environmental analysis should address.” In order for AFRC to provide this input, we would first like to comment on the objectives outlined in the Scoping Notice.

While AFRC supports the five “Overall Objectives” as they relate to implementing actions on-the-ground, we believe that there are only two objectives that should form the basis for the Purpose and Need in the EA. The Scoping Notice starts with a section on why the BLM is proposing the project. It clearly states that the project was developed “to demonstrate the application of ecological restoration principles *developed by Drs. Jerry Franklin and Norm Johnson*” (emphasis added). This is the main objective and therefore should be the first “Purpose and Need” listed in the EA. The objectives listed in the Scoping Notice are some of the outcomes of applying the restoration principles of Drs. Johnson and Franklin but they are not the objective or purpose and need for the project. The main objective of this project is to test the specific recommendation of Drs. Johnson and Franklin and this should be clearly stated.

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Since these lands are governed by the O&C Act, the second objective must be to sell wood products in the most economical manner in order to maximize the potential receipts to the counties. With these as the Purpose and Need for the project, the five “Overall Objectives” listed in the scoping notice will be met.

Since the Purpose and Need of the project is to demonstrate the restoration ideas of Drs. Johnson and Franklin, AFRC generally agrees with the “framework” detailed in the Scoping Notice except for one point, this is the requirement of “(N)o proposed restoration activity in ‘roadless’ areas.” We do not see this as being an ecologically based recommendation. If areas within “roadless” areas are in need of restoration, these lands should be included in the analysis and in one of the alternatives.

AFRC would like to see an alternative that maximizes the number of acres treated, uses the most economical harvest systems, maximizes the volume per acre removed within the limitations of Drs. Johnson and Franklin principles, has the minimum number of operating restrictions, and does not exclude the removal of large trees or the construction of new roads which are needed to meet the restoration objectives of Drs. Johnson and Franklin’s.

AFRC would like to see the following issues and concerns addressed in the EA.

- What are the current land allocations in the project area? What are their stated intentions for management and how does this project meet these?
- The EA should include a detailed economic analysis, displaying the difference in alternatives.
- What are the potential negative effects of not treating land within the 5,000 acre analysis area? (refer to the Sampson Cove EA)
- What decision making process occurred that reduced the size of the project from 50,000 acres within the watershed to the proposed 974 acres of treatment? How did the BLM get from 50,000 acres of BLM land in the watershed to commercially treating 367 acres? We would like to see the number of acres in this watershed that are in need of treatment, and explanations to why the remaining acres are not being treated.
- When designing these timber sales the BLM needs to pay careful attention to the economic analysis. There needs to be some room for changes in log prices. By the time the BLM puts the project up for sale the log prices could decrease. If this project does not pencil out to be a profitable project, it will not sell. As a result, the land will not get treated and lots of time and money will be wasted.
- Appropriate and **locally available** harvesting systems should be used when designing the Pilot Joe Timber Sale. Since this timber sale is relatively small in size and spread out over many miles of roads the BLM should also consider the amount of equipment needed for the entire timber sale. After reviewing the potential units, we believe a small to mid-sized yarder could effectively log the majority of the land identified for treatment. Helicopter logging systems are available in this area, however the current economics will not allow for this system to be used.

AFRC also supports the needed road construction, reconstruction, and maintenance that will help the Medford BLM offer economically viable timber sales, give them greater access to the area for future fuel reduction treatments, and improve the agency's ability to respond to wildfires. Temporary roads can always be removed, or made inaccessible to vehicles after logging operations are completed. We have visited these proposed roads and units on the ground and agree that the roads need to be built in order to treat the acres in an economical fashion. The only suggestion that we would like considered in relation to the road building, is the road proposed for logging unit 27-1 should end at the top of the ridge, and a multi-span logging system be used. The proposed roads in units 32-1 and 34-2 definitely need to be built in order to treat the stands. We did not have a chance to look at the road in unit 31-4A.

Seasonal, recreational, and wildlife restrictions often make timber sales extremely difficult to complete within the contract timelines. Fire season restrictions on top of seasonal and wildlife restrictions can often limit workdays to 4-5 hours. All these restrictions have a cost to the purchaser and results in a lower bid for the stumpage. AFRC would like to encourage the Medford BLM to offer sales that will allow winter harvesting on improved roads or allow for roads and spurs to be improved so wet season harvesting can be accomplished. The loggers need winter work and the mills generally need winter wood, this is a big bidding issue for a purchaser.

For fuel treatments, AFRC would like to see the BLM have some flexibility. Rather than specifying a specific method of accomplishing your resource objectives, you should instead identify the objectives you are trying to accomplish and any limitations to resource disturbance you require. The purchaser could then identify the method they would like to implement to meet the resource objectives given their particular employee/equipment mix. By doing this, the purchasers' can maximize their efficiencies' which will translate into higher bid rates and higher returns to the government. In the case of hand piling, the resource objective might be to reduce the amount of 1-20 hour fuels to XX tons per acre while not increasing soil compaction on more than XX percent of the unit by more than XX and not damaging more than XX% of the leave trees. The purchaser could then determine the most cost effective method to accomplish the resource objectives thereby maximizing the retained receipts that could be used for other restoration activities.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Pilot Joe Timber Sale. Should you have any questions regarding the above comments, or get an appeal on this project, please contact me at 541-342-1892 or btенbusch@amforest.org.

Sincerely,

Brian Tenbusch
AFRC Western Oregon Field Forester
American Forest Resource Council